

UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America

v.

Christopher Martin

Case: 2:23-mj-30157

Assigned To : Unassigned

Assign. Date : 4/14/2023

Case No.

Description: RE: CHRISTOPHER
MARTIN (EOB)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of April 12, 2023 in the county of Wayne in the
Eastern District of Michigan, the defendant(s) violated:*Code Section**Offense Description*

18 U.S.C. § 922(g)(1)

Felon in possession of a firearm

This criminal complaint is based on these facts:

See attached affidavit.

☒ Continued on the attached sheet.Sworn to before me and signed in my presence
and/or by reliable electronic means.Date: April 14, 2023City and state: Detroit, MI*Complainant's signature*Jaclyn Kocis-Maniaci, Task Force Officer, ATF*Printed name and title**Judge's signature*Hon. David R. Grand, United States Magistrate Judge*Printed name and title*

**AFFIDAVIT IN SUPPORT OF
CRIMINAL COMPLAINT**

I, Task Force Officer Jaclyn Kocis-Maniaci, being first duly sworn, hereby depose and state as follows:

I. INTRODUCTION AND AGENT BACKGROUND

1. I am a police officer with the City of Detroit. I have been with the Detroit Police Department since 2003. I became a Task Force Officer with the Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF) in January of 2017. During my career, I have been involved in numerous investigations involving firearms and narcotics cases resulting in successful federal and state prosecutions.

2. I make this affidavit from personal knowledge based on my participation in this investigation. The information comes from witnesses interviewed by law enforcement, communications with others who have personal knowledge of the events and circumstances described herein, and information gained through my training and experience.

3. This affidavit is for the limited purpose of establishing probable cause that Christopher MARTIN (DOB xx/xx/1989) has violated 18 U.S.C. § 922(g)(1), felon in possession of a firearm, and does not contain all details or facts known to law enforcement related to this investigation.

II. PROBABLE CAUSE

4. On April 12, 2023, Detroit Police officers (DPD) were patrolling the area of Balfour and Courville, in the city of Detroit, when they observed a gray 2019 Jeep Compass, who failed to use a turn signal. DPD officers initiated a traffic stop with their emergency lights and siren.

5. The vehicle continued to drive approximately (6) six houses and then parked. The driver, later identified as Christopher MARTIN, exited the vehicle. DPD officers gave verbal commands to MARTIN, advising him to stay in the car. MARTIN ignored all the verbal commands and fled on foot through the back yard. DPD officers observed MARTIN gripping a heavy object in his right pocket of his shorts. MARTIN was observed throwing a handgun in the alley behind a house on Balfour Street. MARTIN continued to run, gripping his right pocket. DPD officers observed MARTIN throw an extended magazine over a fence.

6. Eventually MARTIN stopped running and surrendered to the DPD officers. Additional officers assisted at the scene, the handgun and extended magazine was recovered from the area officers observed MARTIN throwing them.

7. The handgun officers recovered from MARTIN's flight path was a Glock 40 caliber handgun, model 23, Serial number BXAM757. The firearm appears to be registered to MARTIN's mother.

8. On April 13, 2023 a computerized criminal history check showed that Christopher MARTIN has the following felony convictions:

- a. 2012 – attempt-felony controlled substance-delivery/manufacture, 3rd Circuit Court, Detroit, Michigan;
- b. 2014 – felony stolen property, receiving and concealing, motor vehicle, 3rd Circuit Court, Detroit, Michigan;
- c. 2017 – felon in possession of a firearm, US District Court, Eastern District of Michigan, Detroit, Michigan;
- d. 2019 – felon in possession of firearm/ammunition, US District Court, Eastern District of Michigan, Detroit, Michigan.

On April 13, 2023, ATF Special Agent Joshua McClean advised, based upon the verbal descriptions provided, without physically examining the firearm, that the referenced Glock firearm is a firearm as defined under 18 U.S.C. § 921, and was manufactured outside of the State of Michigan after 1989, and therefore had traveled in and affected interstate commerce.

III. CONCLUSION

9. Christopher MARTIN is currently on federal supervised release for felon in possession of a firearm. Probable cause exists that Christopher MARTIN, a convicted felon, and knowing that he was a convicted felon, did knowingly possess a

firearm and ammunition that had previously traveled in interstate and/or foreign commerce, in violation of 18 U.S.C. § 922(g)(1).

Respectfully Submitted,



Jaclyn Kocis-Maniaci, Task Force Officer
Bureau of Alcohol, Tobacco, Firearms
and Explosives

Sworn to before me and signed in my
presence and/or by reliable electronic means.



HONORABLE DAVID R. GRAND
UNITED STATES MAGISTRATE JUDGE

Date: April 14, 2023